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5 UNITED STATES DISTRICT COURT
6 DISTRICT OF NEVADA

7
8 UNITED STATES OF AMERICA,
Plaintiff,

9
10 vs.

11 JAMES VICTOR TINNES,
Defendant

)
) Case No. 2:20-mj-00177-EJY

)
) STIPULATION TO VACATE STATUS
) CONFERENCE
) (First Request)

12 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
13 Trutanich, United States Attorney, and Rachel Kent, Assistant United States Attorney,
14 counsel for the United States of America, and Robert Beckett Esq., counsel for James
15 Victor Tinnes, that the Status Conference currently scheduled on December 3, 2020, be
vacated.

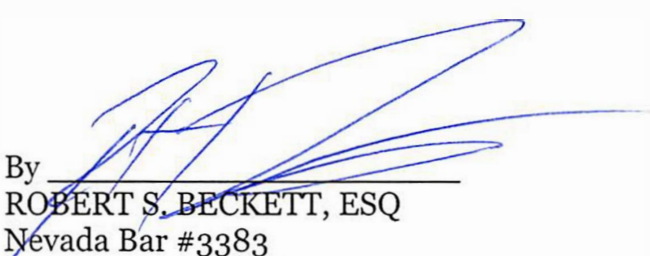
16 This Stipulation is entered into for the following reasons:

- 17 1. Mr. Tinnes has complied with the conditions of his plea, and the
18 completed requirements have been supplied to opposing counsel. He has
not had any contact with law enforcement.
- 19 2. The Defendant did complete all of the conditions within the six (6)
20 months so he should be allowed to withdraw his plea to count one –
21 Operating a Motor Vehicle while Under the Influence of Alcohol and plead
guilty to Count two a charge of Refusal to Submit to a chemical test. The

1 parties will request that the same sentence be applied to the Refusal to
2 Submit to a Chemical Test conviction.

3 Accordingly, the parties agree that the Status Check hearing set for Thursday,
4 December 3, 2020 at 1:30 p.m. be vacated.

5 DATED this 2nd day of December, 2020.

6
7 By 
8 ROBERT S. BECKETT, ESQ
9 Nevada Bar #3383
10 Attorney for Defendant

NICHOLAS A. TRUTANICH
United States Attorney

s/Rachel Kent

11 By _____
12 RACHEL KENT
13 Assistant United States
14 Attorney

UNITED STATES MAGISTRATE JUDGE